

## **Exhibit J**

Grady F. Tollison, Jr.

September 13, 2011

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

TRONOX INCORPORATED, et al.,  
Debtors

) Chapter 11  
) Case No. 09-  
) 10156 (ALG)

TRONOX INCORPORATED, TRONOX  
WORLDWIDE, LLC f/k/a Kerr-McGee  
Chemical Worldwide, LLC, and  
TRONOX, LLC, f/k/a Kerr-McGee  
Chemical, LLC,

)  
) Jointly  
) Administered  
)

Plaintiffs,

) Adversary  
) Proceeding  
) No. 09-01198

V.

ANADARKO PETROLEUM CORPORATION  
And KERR-MCGEE CORPORATION,

) (ALG)

Defendants.

THE UNITED STATES OF AMERICA,  
Plaintiff-Intervenor

V.

TRONOX, INC., TRONOX WORLDWIDE,  
LLC, TRONOX, LLC, KERR-MCGEE  
CORPORATION and ANADARKO PETROLEUM  
CORPORATION,

Defendants.

\*\*\*\*\*

30(b)(6) DEPOSITION OF TOLLISON LAW FIRM, P.A.  
BY AND THROUGH GRADY F. TOLLISON, JR., ESQUIRE,  
CORPORATE DESIGNEE

Taken at the the Law Offices of  
Tollison Law Firm, P.A.,  
103 North Lamar Boulevard,  
Oxford, Mississippi,  
Tuesday, September 13, 2011,  
commencing at approximately 9:00 a.m.

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Grady F. Tollison, Jr.

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1 got involved?

2 A. That -- that would be accurate.

3 Obviously, if we entered an appearance that  
4 would have been -- but, of course, we were  
5 involved before this. We -- we had had -- well,  
6 obviously, we had talked with Bill Liston and  
7 Crymes Pittman, which I'll get into if you ask  
8 me. And -- and I would say we'd been involved a  
9 month, maybe two months before we entered an  
10 appearance, because this -- we knew what we were  
11 -- we knew where this would lead on prior  
12 experience.

13 Q. Do you recall the initial  
14 conversations with Howard Gunn about this case?

15 A. They will be general, not specific. I  
16 did ask him for the history of it, and Howard  
17 was very -- very -- told me what -- what had  
18 transpired up to that time. That would be the  
19 initial conversation, why he wanted us. He felt  
20 like they had tried some other things. He at --  
21 you want me to go back to what I recollect he  
22 told me?

23 Q. Yes, please.

24 A. Okay. He said that they had  
25 originally been in a group with a lawyer in



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1 Columbus, Mississippi named Wilbur Colom, and  
2 they had these cases from the creosote plant,  
3 and Wilbur had a bunch of them, as some other  
4 lawyers did, and some of them are listed here.  
5 I don't know how they got the cases, but they  
6 had a lot of cases of people who lived in  
7 proximity to the creosote plant. They had had a  
8 lawyer named Lundy, who is a Mississippi College  
9 Law School graduate. That's a college in  
10 Jackson, Mississippi, a private, Baptist  
11 college. But he, I believe, lived in Louisiana,  
12 but he was licensed both in Mississippi and  
13 Louisiana. He had graduated from Mississippi  
14 College. He had background -- I don't know him,  
15 but I know of him. And he had had some chemical  
16 background activity in Louisiana, which has a  
17 lot of chemical lawsuits, and he had had  
18 dealings with Kerr-McGee. So Wilbur Colom and  
19 Lundy had, according to Howard, and I'm not sure  
20 of the details, had some settled. Howard's  
21 clients and some of the Columbus lawyers'  
22 clients were not happy with the settlement.  
23 They were very unhappy, and so they opted out of  
24 the settlement. And this is all -- I didn't  
25 investigate any of this or have any independent



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